LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

AMEET B. KABRAWALA ASSOCIATE

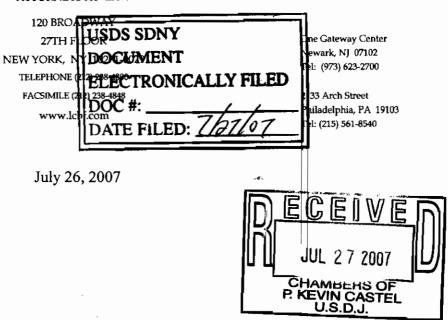
TEL: (212) 238-4870

EMAIL: akabrawala@lcbf.com

MEMO ENDORSED

By Hand

Honorable P. Kevin Castel United States District Court Southern District of New York 500 Pearl Street, Room 2260 New York, NY 10007



Re: Joan Fallon. v. National Passenger Rail Road Corp. 07-cv-03424 (PKC)

Dear Judge Castel:

Please be advised that we represent defendant National Railroad Passenger Corporation ("Amtrak") in the above referenced matter. We are writing to respectfully request a thirty day extension of the July 31, 2007 deadline for conducting depositions, to August 31, 2007. This is the first request for an extension of a deadline in this case. Plaintiff's counsel, Jeffrey Gold, Esq., consents to this request.

We request this extension because we are currently awaiting receipt of plaintiff's medical records from non-party providers. To date, we have received some of plaintiff's medical records, however, we believe more relevant records are outstanding. Once those records are received, we will schedule plaintiff's deposition. We do not anticipate that this will affect the fact discovery deadline, which is currently September 30, 2007, nor the Case Management Conference scheduled for October 26, 2007.

Accordingly, we respectfully request that the Court extend the existing deadline by which depositions must be completed to August 31, 2007. We thank you for your consideration of this

A Miller Rockett

445257.1 DocsNY

Landman Corsi Ballaine & Ford P.C.

Honorable P. Kevin Castel July 26, 2007 Page 2

request and await your decision.

Respectfully submitted,

Ameet B. Kabrawala (AK2976)

ce: <u>Via Facsimile: (516)-512-6334</u> Jeffrey Gold, Esq.